



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7

11201 Renner Boulevard  
Lenexa, Kansas 66219

OFFICE OF THE  
REGIONAL ADMINISTRATOR

MAR 27 2014

**MEMORANDUM**

**SUBJECT:** Field Sampling for Ecological Risk Assessment at the Cherokee County Mine Site  
Operable Unit Eight – Reviewed

**FROM:** Diane Harris *Diane Harris*  
Regional Quality Assurance Manager  
ENSV/IO

**TO:** Venessa Madden  
EPA Region 7 Ecological Risk Assessor  
ENSV/EAMB

The review of the subject document prepared by ENSV/EAMB, dated July 2013, has been completed according to “*EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations*,” EPA QA/R-5 March 2001.

Because the document was unsigned, it was reviewed as a draft and the comments are outlined below. Critical comments identify issues which need to be addressed before the document can be approved. General comments identify opportunities for strengthening the document but do not affect approval.

**Critical Comments**

1. Signature Page. Once the QAPP is ready for final approval it will need to be submitted with the appropriate signatures.
2. § A4. Project/Task Description and Schedule, page 5.
  - a. Will there be a total of 10 soil samples collected across the 20 possible rail bed locations or will 10 soil samples be collected at each of the 20 rail bed locations? Based on the frequency of soil QC samples (assumed to be field duplicates), it appears there may be 10 soil samples at each rail bed location. The number of soil samples to be collected needs to be clarified.
  - b. Because the QAPP was not submitted until March 2014, reference to the sampling taking place in the summer/fall of 2013 needs to be updated.
  - c. All samples will be analyzed for heavy metals but tables 2 and 3 include different analyte lists for water (14 metals not including Ca & Mg for hardness) and solid samples (22 metals). Are these different analyte lists correct for the different matrices and if so, why the differences?

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- d. Water samples will be analyzed for dissolved metals but the QAPP does not address filtering of these samples.
- 3. § B2. Sampling Methods, page 8. Will sampling equipment need to be decontaminated? If so, the QAPP needs to address it. Otherwise, if disposable or dedicated sampling equipment will be used and therefore decontamination does not apply, the QAPP needs to indicate this.
- 4. § D.1 Data Review, Validation, and Verification Requirements, page 12. It is not clear what is meant by the statement that the laboratory "...will not be required to review, validate and verify the laboratory data." The laboratory will review and verify the data according to the method and SOP 2410.10, "Analytical Data Submission Package Contents and Review", prior to the data being reported.

### **General Comments**

- 5. § A4. Project/Task Description and Schedule, page 4. The QAPP states the technical approach could change based on discussions between EPA and other stakeholders. How will changes to the technical approach be documented and would this encompass identifying additional sampling locations in the field as mentioned at the top of page 5?
- 6. § A4. Project/Task Description and Schedule, page 5. It assumed the QC samples mentioned in this section are referring to field duplicates as described in § B5.
- 7. § A7. Documentation and Records, page 7. Please note the following:
  - a. SOP 3122.3 covers method 200.7
  - b. 3123.1C is now 3123.1D
  - c. 2413.12 should actually be 2430.12
  - d. 2410.10 describes the analytical data report content and could be referenced here
  - e. 2420.06H is now 2420.6I
- 8. § B4. Analytical Methods Requirements, page 9.
  - a. Please note there is no table 4 and the information for analytical methods is actually found in § A7.
  - b. And although not specified, corrective action related to the analyses is addressed in the laboratory's procedures previously referenced in the QAPP and it is assumed standard laboratory turnaround times will apply.

9. § C.1. Assessments and Response Actions, page 11. Although not specified, assessments and response actions for the laboratory are addressed in the laboratory's procedures previously referenced in the QAPP.

If you have any questions, please contact me at x7258.

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